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September 17, 2004

BY HAND AND ELECTRONIC MAIL

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 04-33

Dear Secretary Cottrell:

AT&T and its affiliated companies TCG and ACC (collectively "AT&T") herewith file their proposed TRO Amendment to interconnection agreements between AT&T and Verizon. A copy of the attached document has already been provided to Verizon for purposes of initiating negotiations on a footprint wide basis. AT&T reserves its right to make adjustments to this proposal to accommodate matters of specific concern or interest in Massachusetts.

In order to satisfy statutory and contractual requirements to negotiate in good faith, the parties must be given sufficient time to negotiate those provisions. In accordance with AT&T's proposed procedure set forth in its September 1 comments filed in this docket, AT&T proposes a minimum sixty day period from September 13, 2004, the date the *Interim Rules Order* was published in the Federal Register, within which Verizon and AT&T seek to negotiate the amendments they each have proposed. At the end of the sixty day negotiation period, the parties should be allowed to file a petition to arbitrate any contract amendment issues that remain unresolved. As we get closer to the end of the sixty day negotiation period, approximately mid-November, it would be appropriate for the Department to seek a status report from Verizon and AT&T as to which parties are likely to file a petition for arbitration and the number and scope of issues likely to be addressed. The Department will then be in a position to establish a more defined schedule for resolving the remaining open issues.

Thank you very much.

Respectfully submitted,

Mary Cottrell, Secretary
September 17, 2004
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cc: D.T.E. 04-33 Service List

Enclosure